

# DOCKET SECTION

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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Nov 14 4 34 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**THE DIRECT MARKETING ASSOCIATION, INC.'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS RELATING TO THE POSTAL  
SERVICE'S SUPPLEMENTAL DIRECT EVIDENCE DIRECTED TO  
USPS WITNESS DEGEN (DMA/USPS-T12-25-29)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories and requests for production of documents to USPS witness Degen (DMA/USPS-T12-25-29) relating to the Postal Service's supplemental direct evidence. If the designated witness is unable to respond to this interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

  
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November 14, 1997

**Witness Degen (USPS-T-12)**

DMA/USPS-T12-25. Please refer to your supplemental testimony (USPS-ST-47), Exhibit USPS-47A, page 7, concerning data collection procedures.

- a. Please confirm that some IOCS readings are taken by phone. If not confirmed, please explain fully.
- b. Please provide the percentage of IOCS readings that are taken by phone.
- c. Has the Postal Service performed any statistical analysis to test whether the subclass distribution of readings taken by phone is statistically different from the subclass distribution of readings taken in person? If so, please summarize and provide a copy of findings.
- d. Has the Postal Service performed any statistical analysis to test whether any other characteristics of readings taken by phone are statistically different from those for readings taken in person? If so, please summarize and provide a copy of findings.
- e. Is there a field on the IOCS tally data set which indicates whether the tally was taken by phone? If so, please identify the field.
- f. Please describe the skills and training of the personnel actually observing the sampled employee when the data collector is taking the IOCS readings by phone.
- g. Please describe the process by which the person actually observing the sampled employee records the tally information (including identification of the subclass and shape of mail) when the data collector is taking the IOCS readings by phone.

DMA/USPS-T12-26. Please refer to your supplemental testimony (USPS-ST-47), Exhibit USPS-47A, page 6, table 5.

- a. Please confirm that 360,212 of 825,664 IOCS unweighted tallies were assigned the code BF4.
- b. Please list all possible reasons why a tally could be assigned the code BF4.
- c. Please disaggregate BF4 unweighted tally counts by craft and reason listed in subpart b. If you are

unable to disaggregate BF4 tallies according to all reasons listed in subpart b, please disaggregate to the extent possible.

DMA/USPS-T12-27. Please explain whether you are formally adopting and sponsoring Library Reference LR-H-146 and offering it as evidence in this proceeding. If so, please explain whether LR-H-146 was prepared by you or under your direct supervision. If no, please identify whether there is another Postal Service witness who has or is qualified to adopt and sponsor LR-H-146.

DMA/USPS-T12-28. Please explain whether you are formally adopting and sponsoring Library Reference LR-H-218 and offering it as evidence in this proceeding. If so, please explain whether LR-H-218 was prepared by you or under your direct supervision. If no, please identify whether there is another Postal Service witness who has or is qualified to adopt and sponsor LR-H-218.

DMA/USPS-T12-29. Please explain whether you are formally adopting and sponsoring Library Reference LR-H-23 and offering it as evidence in this proceeding. If so, please explain whether LR-H-23 was prepared by you or under your direct supervision. If no, please identify whether there is another Postal Service witness who has or is qualified to adopt and sponsor LR-H-23.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.

  
Michael D. Bergman

November 14, 1997